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July 22, 2025

BY: ECF

Honorable Andrew L. Carter
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

RE: Beach v. City of New York, et al.,
21-cv-06737 (ALC)

Dear Hon. Judge Carter,

We represent Plaintiff in this matter and write to ask for an extension of 60 days of the default 14 days under Rule 54(d)(2)(B)(i) to apply for attorneys' fees pursuant to 42 U.S.C. § 1988 and the judgment entered on July 22, 2025 (ECF No. 101). The extension would allow the parties time to continue to negotiate and attempt to resolve the issue without motion practice. Defendants consent to this application.

Under Rule 54, the deadline for an application is August 05, 2025. With this extension, the new deadline would be October 05, 2024.

We thank Your Honor for your time and consideration.

Respectfully Submitted,



Tahanie A. Aboushi

/s/

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cc: All Counsel of Record (via ECF)